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August 19, 2021

Hon. Ronnie Abrams, District Judge United States District Court, Southern District of New York 40 Foley Square, New York, NY 10007

Re: *Amy Cooper v. Franklin Templeton, et al.*, No. 1:21-cv-04692-RA Joint Request for Adjournment of Initial Conference & Corresponding Obligations

Dear Judge Abrams:

We represent Defendants Franklin Templeton, Franklin Templeton Investments, Franklin Resources, Inc., and Jenny Johnson (collectively, "Defendants") in the above-referenced matter. We write jointly with counsel for Plaintiff Amy Cooper pursuant to Rule 1.D. of Your Honor's Individual Rules & Practices to respectfully request an adjournment of all discovery and scheduling obligations stemming from the Court's Order and Notice of Initial Conference, including an adjournment of the initial status conference currently scheduled for August 30, 2021. Dkt. 7.

By way of background, this Court issued an Order and Notice of Initial Conference on June 25, 2021, scheduling an initial status conference for August 30, 2021 and requiring the parties to submit a joint letter and proposed case management plan and scheduling order by August 23, 2021. Dkt. 7. Defendants then filed a Motion to Dismiss the Complaint in its entirety on August 9, 2021. Dkt. 13. The parties now jointly request an adjournment of all discovery and scheduling obligations stemming from the Order and Notice of Initial Conference until after the Court's decision on Defendants' Motion to Dismiss (Dkt. 13) in order to ensure that the proper scope of parties and claims remaining in this action, if any, is determined before incurring discovery costs.

This is the parties' first request for an adjournment.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Grace E. Speights
Grace E. Speights

cc: All counsel of record (via ECF)

Application granted. The August 30th conference and related submissions are adjourned *sine die*. If the parties request oral argument on the pending motion to dismiss, they shall do so in writing.

SO ORDERED.

Hon. Ronnie Abrams

08/20/21

Morgan, Lewis & Bockius LLP